

District Judge James L. Robart
Magistrate Judge S. Kate Vaughan

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JANE DOE,

Petitioner-Plaintiff,

v.

DREW BOSTOCK, *et al.*,

Respondents-
Defendants.

Case No. C24-0326-JLR-SKV

STIPULATED MOTION TO EXTEND
DEADLINE AND [~~PROPOSED~~]
ORDER

Noted for Consideration:
July 9, 2024

The parties, by and through their counsel of record, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and move to extend Respondents' deadline to file a return to the habeas petition to July 29, 2024. Dkt. 21. Respondents' current deadline to file a return is July 15, 2024. Dkt. No. 20, Order for Return and Status Report, § 2241 Petition.

A court may modify a deadline for good cause. Fed. R. Civ. P. 6(b). Continuing pretrial and trial dates is within the discretion of the trial judge. *See King v. State of California*, 784 F.2d 910, 912 (9th Cir. 1986).

The parties submit that there is good cause for the two-week extension of the deadline. Petitioner's next hearing date in her removal proceedings is scheduled for July 16, 2024. The results of the hearing may be determinative of how this litigation proceeds. Accordingly, an extension will allow the parties to confer, if appropriate, after the administrative hearing date and for Respondents to complete a return based on the posture of the administrative proceedings after the hearing.

Accordingly, the parties respectfully request that the Respondents' deadline to file a return be extended to July 29, 2024.

DATED this 9th day of July, 2024.

Respectfully submitted,

TESSA M. GORMAN

GIBBS HOUSTON PAUW

TESSA M. GORMAN
United States Attorney

s/ Adam W. Boyd
ADAM W. BOYD, WSBA# 49849
1000 Second Avenue, Suite 1600
Seattle, Washington 98104
Phone: (206) 682-1080
Email: adam.boyd@ghp-law.net

s/ Michelle R. Lambert
MICHELLE R. LAMBERT, NYS #4666657
Assistant United States Attorney
United States Attorney's Office
Western District of Washington
1201 Pacific Avenue, Suite 700
Tacoma, Washington 98402
Phone: (253) 428-3824
Fax: (253) 428-3826

RIGHTS BEHIND BARS

s/ Oren Nimni
OREN NIMNI*, MA # 691821
416 Florida Avenue, NW #26152
Washington, DC 20001
Phone: (202) 455-4399
Email: oren@rightsbehindbars.org
*Pro Hac Vice

(253) 428-38
Email: michelle.lambert@usdoj.gov

Attorneys for Defendants

I certify that this memorandum contains 203 words, in compliance with the Local Civil Rules. *Attorneys for Plaintiff*

///

///

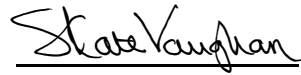
STIPULATED MOTION
[Case No. C24-0326-JLR-SKV] - 2

UNITED STATES ATTORNEY
1201 PACIFIC AVE., STE. 700
TACOMA, WA 98402
(253) 428-3800

[PROPOSED] ORDER

For good cause, Respondents' deadline to file a return is extended to July 29, 2024. It is
so **ORDERED**.

DATED this 10th day of July, 2024.



S. KATE VAUGHAN
United States Magistrate Judge